JUSTIFICATION AND APPROVAL

FOR OTHER THAN FULL AND OPEN COMPETITION

1. Contracting Activity: Department of Veterans Affairs (VA)

Office of Acquisition Operations (OAO)

Strategic Acquisition Center (SAC)

10300 Spotsylvania Avenue, Suite 400

Fredericksburg, Virginia 22408

2. Description of Action: The proposed is for a sole source, firm-fixed price (FFP) contract for American Society of Clinical Pathology's (ASCP) non-GYN assessment program. The period of performance is 5 years with a base period of 12 months and four one-year option periods. The total estimated value of the proposed action is $605,055.66. This effort is being conducted under the authority of 41 U.S.C.3304(a)(1) as implemented by the Federal Acquisition Regulation (FAR) Subpart 6.302-1 entitled, "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."

3. Description of Supplies or Services: The proposed action is to provide ASCP's non-GYN Digital Image program which will allow approximately 2000 VA Pathologists and Cytotechnologists to meet Continuous Quality Improvement (CQI) requirements as specified VHA Handbook 1106.01. ASCP is the world's largest medical membership society of pathologists and laboratory professionals and is comprised of pathologists from many sub-specialty disciplines, laboratory scientists, and a host of laboratory professionals. ASCP serves its members and ultimately patients through Board of Certification (the only BOC for lab professionals), Publications, Educational Programs, and Advocacy and Outreach. ASCP's Non-GYN Digital Image Program is a service that incorporates the use of printed digital image products (not glass-slides) of Non-Gynecologic cytology specimens to be utilized as an element to determine competency of the specific activities performed at a VA medical facility by individual for Pathologists, Cytopathologists, Cytotechnologists, Pathology Residents and Cytopathology Fellows.

4. Statutory Authority: This acquisition is conducted under the authority of 41 U.S.C.3304(a)(1) as implemented by the Federal Acquisition Regulation (FAR) Subpart 6.302-1 entitled, "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."

5. Rationale Supporting Use of Authority Cited Above: The VHA Handbook 1106.01 states each "*VA medical center must provide an ongoing, comprehensive QM program under the direction of the Chief or Director, P&LMS, which evaluates the effectiveness of the laboratory and the medical center policies and procedures in providing the highest quality laboratory medicine test results and anatomic pathology reports and ensures the availability of accurate, reliable, and timely laboratory medicine test results and anatomic pathology reports to the patient's health care provider.*". QM programs include assessments for overall (laboratory) proficiency testing performance, staff competency compliance, staff training

compliance, and staff continuing education units. The VHA Handbook 1106.01 also specifies the function of anatomic pathology external quality review programs is to identify laboratories and individuals who are unable to reliably distinguish clinically important findings and report them in a conventional manner to communicate the important finding(s) to the patient's provider. In addtion, the Handbook specifies these programs must be designed to identify deficiencies resulting from inadequate experience, education, or training, after identification of deficiencies, and lead to focused reviews and additional education and training as required to remedy the deficiency, and facilitate continual improvement in the anatomic pathology services. As such, to meet the VA requirements the QM program must provide each individual participant's a (graded) score for each event and VA vs Non-VA peer comparision data. The(incumbent) ASCP's non-GYN assessment program is the sole program which provides performance reports for all individuals.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in the market research section of this document. This effort did not yield any additional sources that can meet the Government's requirements. There is no competition anticipated for this acquisition. Additionally, the proposed action will be synopsized on the Federal Business Opportunities Page in accordance with FAR 5.201. Any proposals that are received shall be evaluated.

7. Actions to Increase Competition: The Government will continue to conduct market research to ascertain if there are changes in the market place that would enable future actions to be competed.

8. Market Research: Beginning on July, 2014, market research was conducted via web-based search on manufacturer, cytology programs, and catalogs. There were no (0) SDVOSB business and only 1 large business capable of providing the technical functions required to meet VA laboratory needs.

9. Other Facts: None.

10. Technical and Requirements Certification: I certify that the supporting data under my cognizance, which are included in this justification, are accurate and complete to the best of my knowledge and belief.

Name: [redacted] Date: [redacted]

Title: [redacted] Signature: [redacted]

11. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price to the Government for this contract action will be fair and reasonable based on previous contracts with the Federal Government.

Name: [redacted] Date: [redacted]

Procuring Contracting Officer Signature: [redacted]

12. Procuring Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief. As this contract action does not exceed $650,000, the certification below required by FAR 6.303-2(b) (12) serves as approval.

Name: [redacted] Date: [redacted]

Procuring Contracting Officer Signature: [redacted]

13. Legal Sufficiency Certification: I have reviewed this justification and find it legally sufficient as to formalities and compliance with the requirements set forth in FAR 6.302-1 only."

Name: Date: [redacted]

Legal Counsel Signature: [redacted]